

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MIRDUH SPAHIJA,

Plaintiff,

v.

RAE-ANN HOLDINGS, INC., et al.,

Defendants.

CASE NO.: 1:22-cv-01986

JUDGE: DONALD C. NUGENT

**PLAINTIFF'S UNOPPOSED MOTION
FOR AN EXTENSION OF TIME TO
RESPOND TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
ON PLAINTIFF'S CLAIMS**

Now comes Plaintiff Mirduh Spahija, by and through undersigned counsel, and hereby requests that this Honorable Court grant Plaintiff a 7-day extension, to and including August 29, 2023, within which to file a response to Defendants' Motion for Summary Judgment on Plaintiff's Claims.

This Motion is not made for purposes of delay. For cause, the undersigned submits that his father has been and is currently hospitalized, and he will be unable to devote time towards responding to the Motion. Therefore, the undersigned requires additional time to prepare properly to respond to Defendants' Motion for Summary Judgment on Plaintiff's Claims. Also, Plaintiff's counsel conferred with Defendants' counsel who indicated that he does not oppose the instant Motion.

As such, Plaintiff prays that this Honorable Court grant the within Unopposed Motion for an Extension of Time to Respond to Defendants' Motion for Summary Judgment on Plaintiff's Claims until August 29, 2023.

Respectfully Submitted,

/s/Ziad Tayeh

Ziad Tayeh (0088027)

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CERTIFICATE OF SERVICE

The foregoing Motion was filed with the electronic filing system on this 22nd day of August 2023. Notice of this filing will be delivered through the electronic filing system.

/s/Ziad Tayeh_____

Ziad Tayeh (0088027)
Tayeh Law Offices, LLC
Attorney for Plaintiff